

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

WELTMAN, WEINBERG & REIS CO., LPA

By: Cameron Deane, Esq. (Atty.

I.D.# 36334-2021)

520 Walnut Street, Suite 1355

Philadelphia, PA 19106

267-940-1643

WWR# 041479212

Attorneys for Movant: Citizens Bank, N.A.

IN re:

Yulissa Paredes
Debtor

Case No.: 24-14079-JKS

Chapter: 11

Judge: John K. Sherwood

CERTIFICATION IN SUPPORT OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

I, Jonathan Masello, do hereby certify:

1. I am a Bankruptcy Recovery Manager employed by Citizens Bank, N.A., and I have complete knowledge of the amount due on the within obligation and loan, and I am authorized to make this certification.

2. On February 9, 2022, the Debtor executed a Retail Installment Sale Contract (hereinafter "Contract") for the purchase and use of a 2019 Land Rover Range Rover bearing VIN # SALGS2SV8KA547746 more particularly described in the following paragraph. Pursuant to the Contract, the Debtor became indebted to Citizens Bank, N.A. in accordance with the terms of same. A true and correct copy of the Contract is attached hereto as Exhibit A.

3. The following information sets forth the make, model and serial number of the vehicle, the terms of the Contract, the average retail and trade in value of the vehicle, and the current status of the Debtor's Contract:

a. Make, model and serial number of the motor vehicle:

2019 Land Rover Range Rover

Serial Number: VIN # SALGS2SV8KA547746

b. Original Contract Terms:

- i. Total of payments: \$127,254.24
- ii. Term: 72 Months
- iii. Interest rate: 5.82%
- iv. Monthly Payment: \$1,767.42
- v. First payment due: March 11, 2022

c. Average retail value: \$45,875.00

d. Delinquency Status: Five months delinquent (three pre-petition, two post-petition)

e. Balance due: \$82,896.82

4. Debtor filed the instant Chapter 11 case on April 22, 2024.


5. Since Debtor's Chapter 11 filing, Movant has incurred attorney's fees in connection with this Motion.

6. Movant seeks relief from the Automatic Stay provided by 11 U.S.C. § 362.

7. This certification is made in support of the Relief from the Automatic Stay so that the Movant may exercise all its rights under the applicable non-bankruptcy law and move to protect its rights under the Contract.

8. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date: 6/21/24



Signature

Jonathan Masello Bankruptcy Recovery Manager
Name & Title

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IN re:

Yulissa Paredes

Debtor

Case No.: 24-14079-JKS

Chapter: 11

Hearing Date: July 16, 2024

Judge: John K. Sherwood

**CERTIFICATION OF CREDITOR REGARDING POST PETITION PAYMENT HISTORY
(VEHICLE LOAN/LEASE)**

Jonathan Masello, employed as Bankruptcy Recovery Manager by

Citizens Bank, N.A. hereby certifies the following:

Vehicle lender/lessor: Citizens Bank, N.A.

Vehicle description: 2019 Land Rover Range Rover bearing VIN # SALGS2SV8KA547746

POST-PETITION PAYMENTS (Petition filed on **April 22, 2024**)

Amount Due	Date Payment Was Due	How Payment Was Applied (Mo./Yr.)	Amount Received	Date Payment Received	Check or Money Order Number
1. \$1,767.42	05/11/2024	n/a	\$0.00	n/a	n/a
2. \$1,767.42	06/11/2024	n/a	\$0.00	n/a	n/a
3.					
4.					
5.					
6.					

Amount Due	Date Payment Was Due	How Payment Was Applied (Mo./Yr.)	Amount Received	Date Payment Received	Check or Money Order Number
7.					
8.					
9.					
10.					
11.					
12.					
TOTAL: 3,534.84			\$0.00		

[Continue on attached sheets if necessary.]

Monthly payments past due at \$1,767.42 per month from 05/11/2024 to 06/11/2024: \$3,534.84

Plus miscellaneous amounts due:

Late Charges	\$0.00	
Repossession Fees	\$0.00	
Extension Fees	\$0.00	
Other:	\$0.00	(Specify: [_____])
TOTAL	\$0.00	


TOTAL POST-PETITION PAST DUE: \$3,534.84

Pre-petition arrears: 02/11/2024 to 04/11/2024

3 mos. X \$1,767.42/mo. = \$5,302.26

I certify under penalty of perjury that the above is true.

Date: 6/21/24



Signature
Jonathan Masello